

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
ROBINSON RUIZ, et. al. )  
Defendant )  

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No. 04-cr-10299-PBS-26

**Defendant's Motion to Continue Rule 11 Hearing**

The Defendant's counsel requests that this Court allow the 'Defendant's Motion to Continue Rule 11 Hearing.' The Rule 11 hearing is currently scheduled for January 18, 2006 at 3:00 p.m..

Counsel for the defendant will be out of the country from January 13, 2006 until January 23 2006. In addition, undersigned counsel and the Government's attorney are continuing to work on the details of the plea agreement. Counsel would seek the additional time to allow him to confer with The Assistant United States Attorney, Neil Gallagher regarding the terms of the plea agreement. Further time would help facilitate a clearer plea agreement. The Assistant United States Attorney, Neil Gallagher assents to this motion.

WHEREFORE the Defendant moves that the hearing presently scheduled for January 18, 2006 be continued to a later date.

Respectfully Submitted,  
Robinson Ruiz,  
By His attorney

          /s/Hank Brennan

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Dated: January 10, 2006